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**From:** Kler, Denis [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=A9D107A0B7DF440B94C43F21CE4385E6-KLER, DENIS]  
**Sent:** 7/2/2019 7:30:46 PM  
**To:** Russo, Todd [Russo.Todd@epa.gov]  
**Subject:** Williams - claim 5

Todd-

Per our discussion, below is the claim at different revisions of the letter referral.

\*\*\*\*\*Original claim\*\*\*\*\*

**6.Failed to Comply with NSPS OOOOa for Inlet Gathering and Separation Process Unit**

40 C.F.R. Part 60 Subpart OOOOa, Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015.

40 C.F.R. § 60.5400a applies to the group of all equipment, except compressors, within a process unit, and 40 C.F.R. § 60.5400a(a) states that you must comply with the requirements of §§60.482-1a(a), (b), and (d), 60.482-2a, and 60.482-4a through 60.482-11a, except as provided in §60.5401a.

40 C.F.R. § 60.482-7a(a)(2) A valve that begins operation in gas/vapor service or light liquid service after the initial startup date for the process unit must be monitored according to paragraphs (a)(2)(i) or (ii), except for a valve that replaces a leaking valve and except as provided in paragraphs (f), (g), and (h) of this section, §60.482-1a(c), and §§60.483-1a and 60.483-2a.

40 C.F.R. § 60.482-7a(a)(2)(i) requires the owner or operator to monitor the valve as in paragraph (a)(1) of this section, and that the valve must be monitored for the first time within 30 days after the end of its startup period to ensure proper installation.

Williams provided a response to the EPA's email on May 25, 2018. In the response, Williams stated that entire expansion project would make the facility subject to the requirements of NSPS OOOOa. The response also stated that the train 2 natural gas liquid extraction process was pressurized on December 4, 2017, that the train 1 natural gas liquid extraction process was pressurized on March 28, 2018, and that the Inlet Gathering & Separation, Condensate Stabilization and Gas Dehydration units will be put into service in July 2018.

Williams submitted an NSPS KKK LDAR periodic report dated July 25, 2017, for the period of January 1, 2017 through June 30, 2017. The report indicated that there are 400 valves and 3 pressure relief valves in the Inlet Gathering and Separation process unit.

The process units are in various portions of the facility, however most of the equipment is interconnected. The EPA informed Williams that when multiple process units are interconnected then Williams would need to comply with the more stringent regulations. Therefore, Williams failed to monitor the Inlet Gathering & Separation process unit by January 4, 2018, as required by 40 C.F.R. § 60.482-7a(a)(2)(i).

\*\*\*\*\*Revised claim\*\*\*\*\*

**Claim 5: Failure to Identify Applicability of NSPS OOOOa for the NGL Extraction; Inlet Gathering & Separation, Condensate Stabilization and Gas Dehydration Process Units, Resulting in Missed**

**Monitoring of Valves, Pumps, Closed Vent System, Pressure Relief Device, and Compressors to Ensure Proper Installation, in Violation of 40 C.F.R. § § 60.5400a and 60.482-7a(a)(2).**

Based on the Williams Notification Letter acknowledging that the NGL extraction; inlet gathering and separation, condensate stabilization, and gas dehydration process units underwent modifications in 2017, it was determined that Williams failed to identify NSPS OOOOa applicability for those process units, which resulted in missed monitoring of at least 2,093 components (valves, pressure relief devices, pumps and compressor) to ensure proper installation.

***Relevant Legal Requirements***

Each type of component in a process unit that became subject to NSPS OOOOa is required to be monitored for the first time after the startup period in accordance with the following applicable regulations in Subpart VVa at 40 C.F.R. § 60.5400a:

- Each valve in gas/vapor service or in light liquid service is required to be monitored for the first time within 30 days after the end of its startup period to ensure proper installation and thereafter monthly using Method 21, pursuant to 40 C.F.R. § 60.482-7a(a)(2)(i).
- Each pump that began operation in light liquid service is required to be monitored for the first time within 30 days after the end of its startup period and thereafter monthly, pursuant to 40 C.F.R. § 60.482-2a(1).
- Each closed vent system is required to be inspected initially and thereafter, annually for visible, audible, or olfactory indications of leak pursuant to 40 C.F.R. §§ 60.482-10(f)(1) and (2).
- Each pressure relief device in gas or vapor service is required to be monitored quarterly but no later than 5 calendar days after each pressure release to detect leaks pursuant to 40 C.F.R. § § 60.633(b)(1).
- Each compressor is required to be repaired as soon as practicable, but not later than 15 calendar days after leak is detected pursuant to 40 C.F.R. § 60.482-3(g).

***Facts Supporting Violation***

As indicated previously, according to Williams' May 25, 2018 Notification letter, the startup date for the NGL extraction; inlet gathering and separation, condensate stabilization and gas dehydration process units was on December 4, 2017, at which time the Facility became subject to OOOOa and Williams was required to commence monitoring the components in the respective process units, including valves, pumps, pressure relief device and compressors, in accordance with the requirement in Subpart VVa. Based on the Facility's LDAR periodic report dated January 19, 2018, submitted pursuant to Subpart KKK, the respective process units had a total of 2,066 valves, 15 pumps, 1 compressor and 11 pressure relief devices as indicated in Table 2 below. All the new and existing components in the train 2 NGL extraction process units became subject to NSPS OOOOa on December 4, 2017, and Williams was required to commence monitoring each type of component in accordance with the respective schedules established in Subpart VVa.

**Table 2 (Missed Monitored Components: Valves, Pumps, Compressors and Pressure Relief Devices)**

Process Units	Valves	Pumps	Compressors	Pressure relief devices
NGL Extraction	841	10	0	1
Inlet Gathering and Separation	382	0	0	3
Gas Dehydration	246	0	0	7
Condensate Stabilization	597	5	1	0
Total	2066	15	1	11

Williams' failure to identify NSPS OOOOa applicability for the components in the NGL extraction, Inlet Gathering & Separation; and Gas Dehydration process units by January 4, 2018, (30 days after the beginning date of the startup period) resulted in missed monitoring of at least 2,093 components including, 2,066 valves, 1

pressure relief devices, 15 pumps and 1 compressor and therefore Williams is in violation of 40 C.F.R. §§ 60.5400a; 60.482-7a(a)(2) and 60.482-7a(a)(2)(i).

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